

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA ex rel.
CAMERON JEHL,**

Plaintiffs,

v.

**GGNSC SOUTHAVEN LLC D/B/A
GOLDEN LIVING CENTER
SOUTHAVEN et al.**

Defendants.

Case No. 3:19cv091-MPM-JMV

**DECLARATION OF LILY A. NORTH IN SUPPORT OF DEFENDANTS'
APPLICATION FOR ATTORNEYS' FEES AND OTHER EXPENSES**

I, Lily A. North, having personal knowledge of the facts contained in this Declaration and being competent to testify to them, hereby state as follows:

1. I am an attorney at the law firm of Benesch, Friedlander, Coplan & Aronoff, LLP. I represented Defendants Drumm Merger Co. (formerly Drumm Corp.) and Ronald E. Silva in this matter. My work in this matter started in November 2019 and ended in March 2021 (other than preparing this declaration).

2. I have worked at Benesch, Friedlander, Coplan & Aronoff, LLP for nearly four (4) years out of their San Francisco office, where my practice focuses primarily on complex commercial litigation. Prior to that, I worked at Dechert LLP for nearly eleven (11) years. I have defended Drumm and Mr. Silva in prior lawsuits in Mississippi and other jurisdictions related to Golden LivingCenter facilities, and successfully raised personal jurisdiction and other defenses stemming from the fact that Drumm and Mr. Silva never operated any Golden LivingCenters.

3. In this case, I reviewed the Complaint and drafted and reviewed the Motion to Dismiss, including researching defenses and other legal issues and conferring with co-counsel

regarding strategy. I also reviewed and responded to a subpoena served on Drumm, including researching relevant legal issues, researching potentially responsive records, and corresponding and conferring with Plaintiff's counsel.

4. My firm currently charges \$495 per hour for my services in similar matters, and my firm periodically increases my hourly rate. My customary hourly rate of \$450 per hour was charged in 2019, 2020, and 2021 to Defendants for my services in this matter and was paid in full. I have also spent 2.2 hours researching for and preparing this declaration, for which my firm will charge an hourly rate of \$495. In total, I spent 45.9 hours on this matter, including the time spent preparing this declaration.

5. My firm's billing statements detail the work that was done on this case. See Exhibit A. The number of hours expended on all legal tasks was reasonable, given the complexity, length, and importance of this case. In particular, I expended significant effort to ensure that my clients were dismissed from a complex False Claims Act (FCA) action.

6. My firm's billing statements also outline the expenses incurred to represent Defendants in the litigation which were charged and paid in full. These expenses include the following:

- Delivery Services
- Computerized Legal Research
- Fees Related to Completing my Pro Hac Vice Application

7. I believe my fees are very reasonable for an attorney with my skill and experience based in California, and were appropriate to represent Defendants Drumm and Mr. Silva given the seriousness of the allegations against them and the fact that Drumm and Mr. Silva had no contacts with the State of Mississippi to satisfy the traditional notices of fair plan and substantial justice and no involvement in the events underlying this case. My fees are consistent with customary rates charged in San Francisco. I have contributed extensive legal expertise to this action, and Defendants could not have found a representative with the requisite knowledge and

expertise in the Northern District of Mississippi (and, as I stated, Defendants did not even have contacts with the forum).

A handwritten signature in blue ink, appearing to read 'L.A.N.', with a long horizontal flourish extending to the right.

Lily A. North

Executed on this 26th day of April, 2023